

Kimberlee A. Colbo  
HUGHES GORSKI SEEDORF  
ODSEN & TERVOOREN, LLC  
3900 C Street, Suite 1001  
Anchorage, Alaska 99503  
Telephone: (907) 274-7522  
Facsimile: (907) 263-8320  
Email: [kcolbo@hglawfirm.net](mailto:kcolbo@hglawfirm.net)

Attorneys for Defendant State Farm Mutual  
Automobile Insurance Company

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

SARAH L. RISCH, GINGER D. RISCH  
and BRADLEY M. RISCH,

Plaintiffs,

vs.

Case No. \_\_\_\_\_

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY, an Illinois  
corporation,

Defendant.

**NOTICE OF REMOVAL**

TO: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

This notice of defendant State Farm Mutual Automobile Insurance  
Company respectfully shows:

1. That on the 29<sup>th</sup> day of September, 2015, an action was commenced in the Superior Court for the State of Alaska at Palmer, entitled *Sarah L. Risch, Ginger D. Risch and Bradley M. Risch v. State Farm Mutual Automobile Insurance Company*, Case No. 3PA-15-02131CI. Plaintiffs' complaint alleges that the amount in controversy is in excess of \$100,000. Therefore, the amount in controversy is greater than \$75,000, exclusive of interest, costs and fees.

2. That this notice of removal is being filed pursuant to Title 28, United States Code § 1446(a) and (b) within thirty (30) days after receipt by defendant State Farm Mutual Automobile Insurance Company of the Summons and Complaint in the above-referenced action. Service of the Summons was accomplished on State Farm, via service on the Alaska Division of Insurance, on November 30, 2015.

3. This court has original jurisdiction of this action pursuant to Title 28, U.S.C. Section 1332(a), and this action may be removed to United States District Court pursuant to Title 28, U.S.C. Section 1441 and Section 1446(b), in that it is a civil action, the sum in controversy exceeds \$75,000, exclusive of interest and costs, and complete diversity exists between the plaintiffs and defendant.

4. On information and belief, at the time this action was commenced, Plaintiffs are residents of the State of Alaska as alleged in the Complaint.

5. At the time this action was commenced, defendant State Farm Mutual Automobile Insurance Company was, and is, an insurance company organized

under the laws of the State of Illinois, with its principal place of business in Bloomington, Illinois.

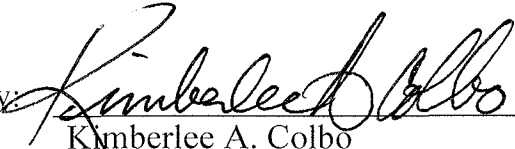
6. Defendant State Farm Mutual Automobile Insurance Company will pay all costs and disbursements incurred by reason of removal proceedings hereby brought should it be determined that this case is not removable or is improperly removed.

WHEREFORE defendant State Farm Mutual Automobile Insurance Company gives notice that this action formerly pending in the Superior Court for the State of Alaska, Third Judicial District at Palmer is hereby removed to this court.

DATED at Anchorage, Alaska, this 30<sup>th</sup> day of December, 2015.

HUGHES GORSKI SEEDORF  
ODSEN & TERVOOREN, LLC,  
Attorneys for Defendant State Farm

By:

  
Kimberlee A. Colbo  
ABA No. 9211072

348972

HUGHES GORSKI SEEDORF  
ODSEN & TERVOOREN, LLC  
ATTORNEYS AT LAW  
3900 C STREET  
SUITE 1001  
ANCHORAGE, ALASKA 99503  
(907) 274-7522  
(907) 263-8320 FAX

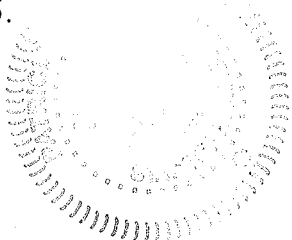
**VERIFICATION**

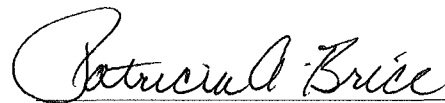
STATE OF ALASKA                    )  
  ) ss.  
THIRD JUDICIAL DISTRICT    )

Kimberlee A. Colbo, being first duly sworn, deposes and states that she is the attorney for State Farm Mutual Automobile Insurance Company, defendant above named; that she knows the contents of this notice of removal and that the same are true and accurate to the best of her knowledge and belief; and that she voluntarily executed the foregoing notice of removal and was fully authorized to do so on behalf of State Farm Mutual Automobile Insurance Company.

  
Kimberlee A. Colbo

SUBSCRIBED AND SWORN TO before me this 30<sup>th</sup> day of December, 2015.



  
Notary Public in and for Alaska  
My commission expires: 6/11/19

I hereby certify that a true and correct copy of the foregoing was served via mail on the 30<sup>th</sup> day of December, 2015 on:

Benjamin I. Whipple  
1150 S. Colony Way  
Palmer, AK 99645

  
Patricia Bruce

HUGHES GORSKI SEEDORF  
ODSEN & TERVOOREN, LLC  
ATTORNEYS AT LAW  
3920 C STREET  
SUITE 1001  
ANCHORAGE, ALASKA 99503  
(907) 274-7522  
(907) 263-8320 FAX